

FILED

OCT 28 2021

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA, ) I N D I C T M E N T  
Plaintiff, )  
v. )  
WILLIE J. WILLIAMS, )  
LELA L. HILL, )  
Defendants. )  
CASE NO. 1:21 CR 760  
Title 18, United States Code,  
Sections 922(a)(6), 924(a)(2),  
and 2

COUNT 1

(False Statement During Purchase of a Firearm, 18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2)

The Grand Jury charges:

1. On or about the May 7, 2021, in the Northern District of Ohio, Eastern Division, defendants, WILLIE J. WILLIAMS and LELA L. HILL, in connection with the acquisition of a firearm, specifically a Glock semi-automatic 9mm pistol, Model 17 Gen5, bearing serial number BTBL638, from Fin Feather Fur Outfitters – Middleburg Heights, LLC, located at 18030 Bagley Road, Middleburg Heights, Ohio, 44130, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Fin Feather Fur Outfitters – Middleburg Heights, LLC, which statement was intended and likely to deceive Fin Feather Fur Outfitters – Middleburg Heights, LLC, as to a fact material to the lawfulness of such sale of the said firearm to HILL under Chapter 44 of Title 18, in that HILL represented that she was the actual buyer of the firearm when, in fact, HILL purchased the

firearm for WILLIAMS; in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

FORFEITURE

The Grand Jury further charges:

2. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the allegation of Count 1 is incorporated herein by reference. As a result of the foregoing offense, Defendant WILLIE J. WILLIAMS and LELA L. HILL shall forfeit to the United States any and all firearms and ammunition involved in or used in the commission of the violation charged in Count 1; including, but not limited to, the following: a Glock semi-automatic 9mm pistol, Model 17 Gen5, bearing serial number BTBL638.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.